

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

SHANNON PEREZ, et al.,	§	
<i>Plaintiffs,</i>	§	CIVIL ACTION NO.
v.	§	
	§	11-CA-360-OLG-JES-XR
STATE OF TEXAS, et al.,	§	[Lead case]
<i>Defendants.</i>	§	
MEXICAN AMERICAN LEGISLATIVE	§	
CAUCUS, TEXAS HOUSE OF	§	
REPRESENTATIVES,	§	CIVIL ACTION NO.
<i>Plaintiffs,</i>	§	SA-11-CA-361-OLG-JES-XR
v.	§	[Consolidated case]
	§	
STATE OF TEXAS, et al.,	§	
<i>Defendants.</i>	§	
TEXAS LATINO REDISTRICTING TASK	§	
FORCE, et al.,	§	
<i>Plaintiffs,</i>	§	CIVIL ACTION NO.
v.	§	SA-11-CA-490-OLG-JES-XR
RICK PERRY,	§	[Consolidated case]
<i>Defendant.</i>	§	
MARGARITA V. QUESADA, et al.,	§	
<i>Plaintiffs,</i>	§	CIVIL ACTION NO.
v.	§	SA-11-CA-592-OLG-JES-XR
RICK PERRY, et al.,	§	[Consolidated case]
<i>Defendants.</i>	§	
JOHN T. MORRIS,	§	
<i>Plaintiff,</i>	§	CIVIL ACTION NO.
v.	§	SA-11-CA-615-OLG-JES-XR
STATE OF TEXAS, et al.,	§	[Consolidated case]
<i>Defendants.</i>	§	
EDDIE RODRIGUEZ, et al.,	§	
<i>Plaintiffs,</i>	§	CIVIL ACTION NO.

v.	§	SA-11-CA-635-OLG-JES-XR
RICK PERRY, et al.,	§	[Consolidated case]
<i>Defendants.</i>	§	

**PLAINTIFF MALC’S DESIGNATION OF POTENTIAL WITNESSES, TESTIFYING EXPERTS, AND PROPOSED EXHIBIT LIST**

Pursuant to this Court’s Amended Scheduling Order, Plaintiff, Mexican American Legislative Caucus, Texas House of Representatives (MALC), hereby submits its designation of potential witnesses, testifying experts, and exhibit list. Plaintiff also submits herewith the reports of Plaintiff’s experts.

**Designation of Potential Witnesses**

MALC submits the following potential witnesses in this cause: Representative Trey Martinez Fischer<sup>1</sup>; Representative Pete P. Gallego; Representative Carol Alvarado; Representative Roberto R. Alonzo; Representative Rafael Anchia; Representative Veronica Gonzalez; Representative Ana Hernandez Luna; Representative Scott Hochberg; Representative Marisa Marquez; Representative Armando Martinez; Representative Richard Pena Raymond; Representative Marc Veasey; Representative Mike Villarreal; Representative Armando Walle; Representative Naomi Gonzalez; Representative Roland Gutierrez; Senator Juan “Chuy” Hinojosa; Senator Mario Gallegos; Senator Jose Rodriquez; Mr. Abel Alonzo; Ms. Lisa Hernandez; Hon. Ramon Garcia, County Judge, Hidalgo County, Texas; Mr. Rick Alvarez, Hidalgo County, Texas; Juanita Valdez-Cox; Gilberto Hinojosa; Mr. Domingo Garcia, Dallas Texas; Ms. Yvonne Ramon, Elections Administrator, Hidalgo County, Texas; Mr. Oscar Villarreal, Elections Administrator, Webb County, Texas.

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<sup>1</sup> Plaintiff previously provided Defendants with the general area of potential testimony as well as the address and phone number where known to Plaintiff of the potential witnesses listed here.

Plaintiff, MALC, also designates by reference those persons listed by Plaintiffs Perez et al., Latino Redistricting Task Force et al., LULAC et al., Cuellar, Rodriguez et al., Morris et al., Quesada et al., and Defendants.

**Designation of Testifying Experts**

Plaintiff MALC designates the following testifying experts: Dr. Morgan Kousser and Dr. Jorge Chapa. The resume and expert reports for these experts are attached hereto.

**List of Proposed Exhibits**

Plaintiff MALC submits the attached list of proposed exhibits.

DATED: August 8, 2011

Respectfully submitted,

/s/ Jose Garza

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TEXAS HOUSE OF REP. (MALC)**

**CAUSE NO. 5:11-CV-361-OLG-JES-XR**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been sent by the Court's electronic notification system August 8, 2011, to counsel of record registered with the court to receive same and to those not so registered the foregoing document has been sent by email as agreed by the parties for each of the cases referenced above, .

/s/ Jose Garza  
Jose Garza

MALC ATTACHMENT NO. 1

**PLAINTIFF MEXICAN AMERICAN LEGISLATIVE CAUCUS (MALC)**

**EXHIBIT LIST**

<b>NUMBER</b>	<b>DESCRIPTION</b>
<b>1.</b>	<b>MALC Gingles Districting Plan H 205 Map</b>
<b>2.</b>	<b>MALC Gingles Districting Plan H 205 Statistical Analysis</b>
<b>3.</b>	<b>MALC Gingles Districting Plan H 111 Map</b>
<b>4.</b>	<b>MALC Gingles Districting Plan H 111 Statistical Analysis</b>
<b>5.</b>	<b>MALC Gingles Districting Plan H 201 Map</b>
<b>6.</b>	<b>MALC Gingles Districting Plan H 201 Statistical Analysis</b>
<b>7.</b>	<b>MALC Gingles Districting Plan C 122 Map</b>
<b>8.</b>	<b>MALC Gingles Districting Plan C 122 Statistical Analysis</b>
<b>9.</b>	<b>MALC Gingles Districting Plan C 123 Map</b>
<b>10.</b>	<b>MALC Gingles Districting Plan C 123 Statistical Analysis</b>
<b>11.</b>	<b>MALC Gingles Districting Plan C 163 Map</b>
<b>12.</b>	<b>MALC Gingles Districting Plan C 163 Statistical Analysis</b>
<b>13.</b>	<b>MALC Gingles Districting Plan C 164 Map</b>
<b>14.</b>	<b>MALC Gingles Districting Plan C 164 Statistical Analysis</b>
<b>15.</b>	<b>MALC Gingles Districting Plan C 187 Map</b>
<b>16.</b>	<b>MALC Gingles Districting Plan C 187 Statistical Analysis</b>
<b>17.</b>	<b>MALC Gingles Districting Plan C 188 Map</b>
<b>18.</b>	<b>MALC Gingles Districting Plan C 188 Statistical Analysis</b>

19. **Expert Report – Morgan Kousser**
20. **Expert Report – Jorge Chapa**
21. **Racial Bloc Voting Charts and Tables**
22. **Table: Minimal Impact of Minority Democrats on the Final House Plan**
23. **Table: Outcomes in “Majority-Minority” State House Districts, 2008 and 2010**
24. **Table: Comparison of “Majority-Minority” Districts in State House Plans**
25. **Table: Comparison of Deviations, County Breaks, and Compactness Scores in State House Plans**
26. **Table: Compactness Scores for House Plans, BHVAP Districts Only**
27. **Table: Ethnic Statistics for Congressional Plan**
28. **Table: Compactness Scores for Congressional Plans**
29. **Table: Packing “Minority Opportunity Districts”**
30. **Table: Stacking Districts Close to Minority Opportunity Districts**
31. **Chart: Population Disparities in the 2000 Texas House Plan Compared with H.B. 150**
32. **Chart: Population Deviations in Majority Anglo and Majority Latino Districts in H.B. 150**
33. **Chart: Population Deviations in Urban Districts Must Reflect Partisan and Ethnic Bias**
34. **Chart: Latino Democratic Districts in Urban Counties**
35. **Figure: The Underpopulated Racially Gerrymandered 41<sup>st</sup> House District**
36. **Figure: Split Precincts, 41<sup>st</sup> House District**
37. **Figure: Capturing Anglo Voters**
38. **Figure: State House District 90, Tarrant County gerrymander**
39. **Figure: State House District 90, Tarrant County, Overlay of Latino Population Concentration**
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41. **Figure: Packing of Latino population, District 104**
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45. **Figure: Travis Sliced and Rivulet District 35**
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50. **Burt Solomon’s Statement regarding MALDEF plan**
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52. **H. B. 150, Red-map isolation map for district 41**
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64. **S. B. 4, Red-map isolation map for district 6**
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66. **S. B. 4, Red-map isolation map for district 14**
67. **S. B. 4, Red-map isolation map for district 2**
68. **Ethnic Statistics for Congressional Plans**
69. **Record Vote on Motion to Table Plan H195**

- 70. Record Vote on Motion to Table PlanH196**
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- 82. Election Time lines**